

AO91 (Rev. 12/03) Criminal Complaint

FELONY

AUSA

United States Courts

UNITED STATES DISTRICT COURT

Southern District of Texas

FILED

October 15, 2021

Southern District Of Texas Brownsville Division

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

- Case Number: 1:21-MJ-974
1. Luis Alberto TORRES A#206 796 368 Mexico ✓
 2. Yulisa RESENDEZ A#216 757 442 United States ✓
 3. Victor Alfonso MARTINEZ-Roman A#200 939 678 Mexico ✓
 4. Jesus Alfonso LOPEZ-Zuniga A#216 757 445 Mexico ✓

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about October 13, 2021 in Cameron County, inthe Southern District Of Texas defendant(s)

knowingly, willfully, and unlawfully combine, conspire and agree together and with each other, in reckless disregard of the fact that nine (9) undocumented alien(s) had come to, entered, and remained in the United States in violation of law; did conceal, harbor and shield from detection said alien(s), and attempted to conceal, harbor, and shield from detection said alien(s),

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(v)(I)(iii)

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

On October 13, 2021 at approximately 11:15 a.m., Rio Grande Valley Sector Intelligence Unit Agents and Homeland Security Investigations Special Agents assigned to Operation Eagle Claw, in conjunction with Brownsville Sector Intelligence Units and the Cameron County Constables Pct. 2 conducted a consented search of a residence located at 914 E. Jefferson Street, Brownsville, TX 78520. This action resulted in the apprehension of 12 undocumented aliens and one United States Citizen. After further investigation, it was determined through sworn statements and photo line-ups that Luis Alberto TORRES, Yulisa RESENDEZ, Victor Alfonso MARTINEZ-Roman and Jesus Alfonso LOPEZ-Zuniga conspired to harbor 9 undocumented aliens at the residence located at 914 E. Jefferson Street, Brownsville, TX 78520.

Continued on the attached sheet and made a part of this complaint:

☐ Yes ☒ No

Signature of Complainant

Hernandez, Duane Border Patrol Agent
Printed Name of Complainant

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1 on

October 15, 2021

Date

at

Brownsville, Texas

City/State

Ronald G. Morgan
Name of Judge

U.S. Magistrate Judge
Title of Judge

Signature of Judge